

EXHIBIT 15



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Transcript of Nieshia Williams

Date: July 28, 2022

Case: Timbers -v- Telligent Masonry, LLC, et al.

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<p>1 be -- did any of his work have to be torn down and 2 redone?</p> <p>3 A Yes.</p> <p>4 Q Who did the tearing down and the redoing 5 of it?</p> <p>6 A It was other masons. I don't recall their 7 specific names.</p> <p>8 Q Did you have any conversations with 9 Mr. Timbers about the neatness of his work?</p> <p>10 A No.</p> <p>11 Q Why?</p> <p>12 A Because I was not the only Foreman on site 13 when Mr. Timbers was there.</p> <p>14 Q So do you know if any other Foremen had 15 conversations with Mr. Timbers at this site about 16 the neatness of his work?</p> <p>17 A I don't know.</p> <p>18 Q You never had a conversation with 19 Mr. Timbers about the neatness of his work at that 20 site?</p> <p>21 A No.</p> <p>22 Q Did you personally see the work that he</p>	<p>17</p> <p>1 photographs that you provided Tia Taylor at a 2 later point in time.</p> <p>3 Are you the person who took those 4 photographs?</p> <p>5 A Yes.</p> <p>6 Q When did you take those photographs?</p> <p>7 A It would have been in June of 2019.</p> <p>8 Between May and June of 2019. In realtime I take 9 photos.</p> <p>10 Q What did you do with the photographs of 11 Mr. Timbers' work after you took the photographs?</p> <p>12 A They're probably still on the phone.</p> <p>13 Q Did you send those to anybody -- at the 14 time in 2019 did you send those to anybody at 15 Telligent?</p> <p>16 A No.</p> <p>17 Q You just took them and kept them?</p> <p>18 A I take photos of all work at all sites at 19 all times.</p> <p>20 Q But regularly you don't send that to 21 anybody else at Telligent?</p> <p>22 A No, it's always just documented for my</p>	<p>18</p> <p>1 performed at the site?</p> <p>2 A Yes.</p> <p>3 Q Did you order the work that he did at the 4 site to be torn down and redone?</p> <p>5 A Yes.</p> <p>6 Q And you believe you told other masons 7 that?</p> <p>8 A Other masons what?</p> <p>9 Q To do that work.</p> <p>10 A Yes, that's the only way it could get done 11 if I told other masons.</p> <p>12 Q I'm saying did you or one of the other 13 masons order the -- did you or one of the other 14 Foremen order the masons to tear down the work?</p> <p>15 A At that point in time in which the work 16 was torn down, the other Foreman that was on site 17 when Mr. Timbers was there was no longer at the 18 site.</p> <p>19 Q So who ordered the masons to redo Timbers' 20 work?</p> <p>21 A I did.</p> <p>22 Q We'll come to it later but there's some</p>	<p>19</p> <p>1 records so I know of the work.</p> <p>2 Q So as we indicated, you didn't have any 3 conversations with Mr. Timbers about the neatness 4 of his work at that site, correct?</p> <p>5 A No, I did not.</p> <p>6 Q Did you talk with anybody else about the 7 neatness of Mr. Timbers' work at that site?</p> <p>8 A Yes.</p> <p>9 Q Who did you talk with?</p> <p>10 A The other Foreman that was leading the 11 work on that site.</p> <p>12 Q And what did you tell him if you can 13 recall?</p> <p>14 A I concurred with his observations or I 15 should say his conclusion that the work was not up 16 to par.</p> <p>17 Q So is he the one who brought the work to 18 your attention?</p> <p>19 A Yes.</p> <p>20 Q Did any issues about the -- other than 21 talking to the Foreman did you talk to anybody 22 else about the neatness of Mr. Timbers' work?</p>
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<p>1 A Yes.</p> <p>2 Q And that the overall philosophy if someone 3 is not doing a good job is to train them and 4 continue to try to make them better; is that 5 correct?</p> <p>6 A Yes.</p> <p>7 Q So is there anything that you're aware of 8 being said to Mr. Timbers about how he should 9 improve?</p> <p>10 Did you have any conversations with 11 Mr. Timbers about that?</p> <p>12 A No.</p> <p>13 Q Are you aware if any of the other Foremen 14 at this particular job site had any such 15 discussions with Mr. Timbers?</p> <p>16 A I don't recall.</p> <p>17 Q Is it usual or unusual for masons to kind 18 of come and go? They'll be there for a period of 19 time and then they may go off to another job at 20 some other company and then come back at 21 Telligent?</p> <p>22 A Yes.</p>	<p>25</p> <p>1 A Exactly.</p> <p>2 Q But do you recall being told by anyone 3 that a particular mason had been terminated?</p> <p>4 A No, because I'm not in H.R.</p> <p>5 Q It doesn't matter why. I'm just saying 6 did anybody ever say to you hey, by the way X has 7 been terminated?</p> <p>8 A There would be as far as a companywide 9 e-mail to be sent to all Foremen do not allow this 10 person on site because they have been terminated 11 from the company.</p> <p>12 Q And how many times in the time that you've 13 been at Telligent have you gotten that form of 14 e-mail?</p> <p>15 A Maybe like three times perhaps.</p> <p>16 Q Would one of those be Mr. Timbers?</p> <p>17 A Probably so. I don't recall. Like I'll 18 look and see okay, this person has been terminated 19 but if they're not on my site I don't move any 20 further as such.</p> <p>21 Q Do you have any specific knowledge of 22 any -- any of the people that you got the e-mail</p>
<p>1 Q That's not unusual, is it?</p> <p>2 A No.</p> <p>3 Q If somebody does that and they come back 4 you put them to work, right?</p> <p>5 A No, that's up to the office to allow them 6 to be hired again.</p> <p>7 Q So you're not involved -- the Foremen are 8 not involved in any of the hiring and firing 9 procedures?</p> <p>10 A No, we don't have the final say so.</p> <p>11 Q Do you have the ability to terminate a 12 mason?</p> <p>13 A No, we don't have the final say so. A 14 recommendation.</p> <p>15 Q In your experience at Telligent for the 16 years you've been there, how many instances are 17 you aware of in which a mason has been terminated?</p> <p>18 A A mason probably -- I just didn't see them 19 so I'm not aware specifically which one has been 20 terminated.</p> <p>21 Q In other words, there was some masons that 22 were there and then they weren't there?</p>	<p>26</p> <p>1 about being terminated where you know the 2 circumstances for the termination?</p> <p>3 A No.</p> <p>4 Q Let me ask the question this way.</p> <p>5 You said about three times you've gotten 6 e-mails saying don't use this person if they show 7 up, correct?</p> <p>8 A Because they've been terminated.</p> <p>9 Q Correct. So in any of those three 10 instances did you know anything about the 11 circumstances for why the person was being 12 terminated?</p> <p>13 A No.</p> <p>14 Q Did you ever recommend that anybody be 15 terminated?</p> <p>16 A No, I've never had to get to the point 17 where I've had to recommend.</p> <p>18 Q I should have asked this at the beginning. 19 Do you have mason experience?</p> <p>20 A From a theoretical point of view I do.</p> <p>21 Q You never actually worked as a mason?</p> <p>22 A In theory. Only in theory. Not</p>

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1	Q But you participated in it?	1	Superintendents.
2	A Yes.	2	Was this one of those meetings or was this
3	Q Do you know who else was in that meeting?	3	scheduled for some specific purpose?
4	A It was -- Kenneth Fisher was there, Jose	4	A That I don't know if it was scheduled for
5	Valladares, Tranquilino. I think Michael Pappas	5	a specific purpose but it was not a Superintendent
6	was there, Chris Pappas.	6	meeting because I'm not a Superintendent.
7	Q Was Ms. Taylor there?	7	Q You could have been getting a promotion
8	A I thought there was a gentleman, a	8	and not know it.
9	Caucasian gentleman that was there. I don't	9	Were issues other than David Timbers
10	recall Ms. Taylor being there. She might have	10	discussed at this meeting?
11	been there. I remember a Caucasian gentleman	11	A Yes.
12	being there.	12	Q And how long was this meeting?
13	MR. TOLAND: Can we go off the record for	13	A It probably was about an hour because we
14	14 a second?	14	had --
15	(Discussion off the record.)	15	Q Do you know how much of the meeting
16	BY MR. TOLAND:	16	16 involved David Timbers?
17	Q I just want to make sure. As far as	17	A No, he was just one of the topics.
18	you're aware there was no attorney at that	18	Q Do you know how long the discussion about
19	meeting, correct?	19	David Timbers lasted?
20	A No.	20	A No.
21	Q You don't know who the Caucasian gentleman	21	Q At some point someone asked you if you had
22	22 was?	22	any information about the quality of Mr. Timbers'
	38		40
1	A He was someone -- I just don't know his	1	1 work, correct?
2	specific title.	2	A Do I document all of --
3	Q Were any other Foremen there?	3	Q At some point someone asked you whether
4	A Jose Valladares and Kenneth Fisher.	4	4 you had any information about the quality of
5	Q And you?	5	5 Mr. Timbers' work, correct?
6	A Yes.	6	A Specifically like to what?
7	Q Do you know what the purpose of the	7	Q Quality of his work.
8	meeting was? Do you know why the meeting	8	A When you say do I have any information
9	9 happened?	9	what are you specifically asking?
10	A I mean I really don't recall. That is the	10	10 Q Let me back it up this way. At some point
11	answer. Like I know we were called in and we were	11	11 as we know it appears to be the --
12	discussing a multitude of topics but specifically	12	A On the 19th?
13	I don't recall like if there was --	13	13 Q From the photographs that you forwarded to
14	Q This meeting wasn't called just about	14	14 Ms. Tia you did that for a reason so what caused
15	David Timbers? Was it a meeting and Timbers was	15	15 you to --
16	16 one of the things discussed or was it called	16	A She asked me for them.
17	17 specifically because of David Timbers?	17	17 Q And she asked you via this e-mail, not at
18	A I was a general meeting that we were	18	18 that meeting?
19	having. Like I don't recall anything beyond that.	19	A Right, via this e-mail.
20	He did come up in the conversation.	20	20 Q But you had had -- the e-mail suggests
21	Q The General Superintendent indicated that	21	21 that you had some discussion with her that you had
22	22 he has meetings on Tuesdays with the	22	22 photographs so this seems like Ms. Taylor knew

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1 A Right.		1 Mr. Valladares?	
2 Q So you would have maybe raised that		2 A No.	
3 incident then?		3 MR. TOLAND: That's all I have.	
4 A Yes.		4 MR. DeGENNARO: Do you want to take a	
5 Q But not prior to that time?		5 little break?	
6 A No, because he was not -- he wasn't on		6 THE WITNESS: No, I'm good.	
7 my -- I had no responsibility for him.		7 MR. DeGENNARO: Ms. Glover, do you want to	
8 Q The photographs that you shared in		8 go first and then I'll ask any questions in light	
9 February of 2021 you didn't share with anyone		9 of your questions and Mr. Toland's?	
10 prior to February of 2021, did you?		10 MS. GLOVER: That's fine.	
11 A No, because I don't forward -- it might		11 EXAMINATION BY COUNSEL FOR THE DEFENDANT	
12 have been forwarded to the GC but I take photos of		12 BY MS. GLOVER:	
13 all work on all sites that I do for my record		13 Q Excuse me, can you pronounce your name for	
14 purposes so would have to check and to confer with		14 me so I can say it correctly?	
15 the general contractor.		15 A Sure, Nieshia Williams.	
16 Q But you don't recall sending these		16 Q Ms. Williams, my name is Alana Glover.	
17 photographs to anyone at Telligent prior to		17 I'm the attorney today on behalf of Ms. Tia	
18 February of 2021?		18 Taylor. I just had a few follow-up questions for	
19 A No.		19 you.	
20 Q Let's go back. I want to make sure I		20 First question I have is we briefly	
21 understand this.		21 discussed the employee handbook. Do you recall	
22 This particular work that Timbers did at		22 receiving the employee handbook at some point in	
	46		48
1 this particular site at that particular time in		1 time when you began your employment with	
2 2019, did you have any conversations prior to this		2 Telligent?	
3 February 2021 meeting with anyone about the		3 A At the start, no, not at the initial start	
4 quality of his work?		4 but I do have an employee handbook.	
5 A Yes.		5 Q Is it your understanding that all	
6 Q So who did you talk to and when?		6 employees of Telligent are bound by that handbook?	
7 A The lead Foreman, Kenneth Fisher.		7 A Yes.	
8 Q At the time?		8 Q And I just briefly want to talk to you	
9 A Yeah, Kenneth Fisher who was the lead		9 about Tia Taylor.	
10 Foreman.		10 Can you explain to me what you generally	
11 Q Other than that conversation you didn't		11 know about Tia Taylor if you have ever met her in	
12 talk with anybody else at Telligent about it?		12 person before?	
13 A No, because I was not the lead Foreman.		13 A If I can recall, once I was introduced to	
14 Q Do you know if Kenneth Fisher talked with		14 her I believe she was the head of Human Resources.	
15 anybody else about the quality -- any of the		15 Q And around what time were you introduced	
16 Superintendents or anybody at Telligent corporate		16 to Ms. Tia Taylor?	
17 about David Timbers' work?		17 A It would have been -- I believe in 2020 so	
18 A I don't know.		18 around August of 2020.	
19 Q Just circle back and we're coming towards		19 Q Do you recall -- go ahead.	
20 the end here.		20 A I believe around August of 2020.	
21 You're not aware of any -- you never heard		21 Q And when you initially met her in August	
22 anything about David Timbers threatening		22 of 2020 what was that introduction? Did you reach	

<p>1 mason -- of course there's different skill levels 2 but there is an expectation that a certain amount 3 of production for whatever is being done -- for 4 example, if it was block, 80-block per day for a 5 mason, 500 brick for a bricklayer, 20 stone for 6 stone but in addition to the production, the 7 quality must be on par so it's that production 8 with quality and the quality includes, you know, 9 plumb, mortar joints, to measurement.</p> <p>10 Q And there were occasions when Mr. Timbers' 11 work did not meet that standard of quality?</p> <p>12 A Yes.</p> <p>13 Q And it would have to be torn down and 14 rebuilt?</p> <p>15 A Yes.</p> <p>16 Q Was that on more than one occasion?</p> <p>17 A When you say "on more than one occasion" 18 what do you mean? There was more than one 19 location in which he worked?</p> <p>20 Q Was it a single instance when his work had 21 to be rebuilt or was it on more than one occasion 22 when he built something it did not meet the</p>	<p>57</p> <p>1 Q Consistently failed to show up.</p> <p>2 A So there's verbal warnings before there's 3 a formal written warning.</p> <p>4 Q And if that employee consistently failed 5 to show up and then they subsequently showed up, 6 would you deny David Timbers work for that reason?</p> <p>7 A I would but that would be after going 8 through the proper channels, giving the verbal 9 warning and then giving the written warning then 10 that would be the case.</p> <p>11 Q There was prior testimony regarding the 12 use of the word "termination" and whether or not 13 you terminate an employee or a mason.</p> <p>14 Are there opportunities when you simply 15 decide not to give that mason work at your job 16 site as a Foreman?</p> <p>17 A As a Foreman you don't have the authority 18 not to but we can recommend to a Superintendent 19 this has occurred so what would you like to do but 20 that's after. Like I said, you have a verbal and 21 then you formally write so if the mason was -- I 22 mean when they sign that they've been formally</p>	<p>59</p>
<p>1 standards and then it had to be torn down and 2 rebuilt?</p> <p>3 A For myself just once at that site, that 4 section in which he did.</p> <p>5 Q And was he aware of this occurring, that 6 the work had not met the quality standard and it 7 had to be rebuilt?</p> <p>8 A I don't know.</p> <p>9 Q Circling back to timeliness, one of the 10 other expectation, was timeliness an issue with 11 Mr. Timbers?</p> <p>12 A Yes.</p> <p>13 Q How so?</p> <p>14 A Arriving to work on time and on a 15 consistent basis.</p> <p>16 Q And you testified that arriving on a 17 consistent basis and without having -- if you were 18 absent there would be an excuse or a reason for 19 it.</p> <p>20 If there was not an excuse or a reason for 21 it what would happen?</p> <p>22 A If the employee did not --</p>	<p>58</p> <p>1 written up and if they were to show then it's 2 taken up between the Superintendent and Human 3 Resources. You don't handle what occurs post 4 that.</p> <p>5 Q Do you have Exhibit 1 in front of you, the 6 pictures? Flip through this very briefly but I'm 7 sure you remember it because we talked about it a 8 half an hour ago.</p> <p>9 Can you describe the quality of the work 10 in that picture?</p> <p>11 A What you see here is basically a lot of -- 12 the mortar that they use to apply the block, it's 13 all over the brick so one of the -- as a seasoned 14 mason that's something that you wouldn't see is 15 mortar all over the block because therefore that 16 incurs more cost on Telligent because we have to 17 go through and scrape the mortar off because 18 that's -- this isn't a finished product for the 19 general contractor.</p> <p>20 Q Would you describe that as poor quality?</p> <p>21 A Poor quality.</p> <p>22 Q Does that not meet Telligent's</p>	<p>60</p>

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1 expectations?		1 chiseled and corrected?	
2 A No, it does not.		2 A Yes.	
3 Q Would that be work that would have to be		3 Q And during the time he was there -- you	
4 redone?		4 take photographs of lots of stuff, correct?	
5 A This is scrape work that has to be redone		5 A Uh-huh.	
6 when it's -- no.		6 Q Yes or no?	
7 Q Would it be corrected at some point?		7 A Yes, I apologize.	
8 A Yes.		8 Q You were doing so good.	
9 Q Going back to the incident with the		9 Those are the only photographs you	
10 elderly couple showing up at the job site, can you		10 submitted to Telligent about bad work by	
11 describe that incident? What happened?		11 Mr. Timbers, correct?	
12 MR. TOLAND: Objection.		12 A Yes.	
13 BY MR. DeGENNARO:		13 Q Presumably if you had more photographs of	
14 Q You can answer.		14 bad work by him you would have documented it,	
15 A I wasn't there. It's just that it was		15 correct?	
16 brought to my attention later on in the day		16 A Yes.	
17 because again, they got stopped by the security at		17 Q And this is all that you sent to	
18 TSA or the security checkpoint at TSA and it was		18 Ms. Taylor, correct?	
19 brought to my attention when I was leaving for the		19 A Yes.	
20 day that an elderly couple showed up looking for a		20 Q Did you give any verbal warning to	
21 check that David Timbers said that he left for		21 Mr. Timbers about the work he did here?	
22 them and because of the fact that it's a secured		22 A No.	
	62		64
1 site, they had a roster of who has authorization		1 Q Therefore, you didn't do any formal	
2 to enter the site so Ms. Ann who was working for		2 written write-up about the work that he did here?	
3 the general contractor was able to look up and say		3 A No.	
4 he's not even -- he's not at the site so there's		4 Q You mentioned about timeliness on his	
5 nothing here for you and the elderly couple		5 part.	
6 departed.		6 Did you ever give a verbal warning to	
7 Once I was told of that I was kind of		7 Mr. Timbers about timeliness?	
8 flabbergasted since he did not work there. His		8 A No.	
9 brother actually was working for me at the moment,		9 Q Did you ever do a formal write-up for	
10 Anthony Timbers and when I told him of -- that an		10 Mr. Timbers about timeliness?	
11 old couple came looking for his brother he just		11 A No.	
12 said oh, he scammed them again.		12 Q Looking at Exhibit 2 if we may and turning	
13 Q Did Anthony Timbers say anything else		13 to the second page of that, just so we're clear	
14 beyond that that you recall?		14 the incident with the older couple that showed up	
15 A No.		15 at the NSA job site, correct?	
16 MR. DeGENNARO: I have no other questions.		16 A TSA.	
17 EXAMINATION BY COUNSEL FOR THE DEFENDANT		17 Q I'm sorry, TSA job site, Mr. Timbers was	
18 BY MR. TOLAND:		18 not working at that site for you in January of	
19 Q Looking at the -- I do. Just a couple.		19 2020, correct?	
20 Just so we're clear, relative to the work		20 A No.	
21 that was done there that brick didn't need to be		21 Q And all the information that you received	
22 torn down and redone. It needed to basically be		22 about that incident came from the representative	